

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
SAN ANTONIO DIVISION**

<b>IN RE</b>	<b>CHAPTER 7</b>
<b>LEGENDARY FIELD EXHIBITIONS, LLC.</b>	<b>CASE NO.: 19-50900-cag</b>
<b>AAF PLAYERS, LLC,</b>	<b>CASE NO.: 19-50902-CAG</b>
<b>AAF PROPERTIES, LLC,</b>	<b>CASE NO.: 19-50903-CAG</b>
<b>EBERSOL SPORTS MEDIA GROUP, INC.,</b>	<b>CASE NO.: 19-50904-CAG</b>
<b>LFE 2, LLC,</b>	<b>CASE NO.: 19-50905-CAG</b>
<b>WE ARE REALTIME, LLC, and</b>	<b>CASE NO.; 19-50906-CAG</b>
<b>DEBTORS.</b>	

**(SUBSTANTIVE CONSOLIDATION OF  
ALL 6 CASES, INTO ONE CASE  
LEGENDARY FIELD EXHIBITIONS,  
LLC, CASE NO. 19-50900-CAG)  
JOINTLY ADMINISTERED UNDER  
CASE NO. 19-50900-CAG)**

**THOMAS G. DUNDON'S AND DUNDON CAPITAL PARTNERS, LLC'S  
MOTION FOR LEAVE TO FILE A SUR-REPLY TO TRUSTEE'S REPLY TO  
OBJECTIONS TO TRUSTEE'S APPLICATION TO COMPROMISE AND SETTLE  
PURSUANT TO FEDERAL RULE OF BANKRUPTCY PROCEDURE 9019**

Thomas G. Dundon ("Dundon") and Dundon Capital Partners, LLC ("DCP"), creditors and parties in interest herein, file this Motion for Leave to file a Sur-Reply to Trustee's Reply to Objections to Trustee's Application to Compromise and Settle Pursuant to Federal Rule of Bankruptcy Procedure 9019 (Doc#433).

1. Dundon and DCP seek leave to file a sur-reply to supplement the record with critical evidence needed for the Court to make a determination of the objections Dundon and DCP set forth, as well as address new and conflicting arguments the Trustee raised in his Reply to

Thomas Dundon's and Dundon Capital Partners, LLC's Response to Trustee Application to Compromise and Settle Under Federal Rule of Bankruptcy Procedure 9019 (the "Reply") (Doc. #433).

2. On several occasions, the Reply provides the Trustee's interpretation and opinion of what certain provisions mean within the Standard Player Agreements ("SPA")—the actual documents Plaintiffs claim entitle the purported class to a priority claim of millions of dollars. *See id.*

3. Critically absent from the Reply or any the Trustee's evidence are the actual SPAs. Because both sides of this dispute cite this evidence, it is important for the Court to review the actual player contracts, and its absence from the record makes it difficult for the Court to make a fully informed determination.

4. Further, in its response, the Trustee presents conflicting arguments and positions from his objections filed last year.

5. Accordingly, Dundon and DCP move for leave to file a sur-reply to add the contracts for the two lead plaintiffs, Colton Schmidt and Reggie Northrup, and to supplement their arguments to address the about-face taken by the Trustee.

6. Dundon and DCP attach their Sur-Reply to Trustee's Reply to Objections to Trustee's Application to Compromise and Settle Pursuant to Federal Rule of Bankruptcy Procedure 9019, as Exhibit A.

**PRAYER**

**WHEREFORE, PREMISES CONSIDERED**, Thomas G. Dundon and Dundon Capital Partners LLC ask the Court grant his Motion, allow Dundon and DCP leave to file the Sur-Reply, attached hereto as Exhibit A, and grant Dundon and DCP all such other and further relief, at law or in equity, to which they may be entitled.

Respectfully submitted,

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**ATTORNEYS FOR DEFENDANT  
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**CERTIFICATE OF SERVICE**

I certify I served the foregoing document by electronic means to the parties of record registered with the court's electronic filing system on September 30, 2021, including those parties to the settlement agreement set forth below:

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